



USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 2/20/2024

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Marina Moraru
Special Assistant Corporation Counsel
Office: 212) 356-2456

February 16, 2023

VIA ECF

Hon. Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *M.P.P. v. N.Y.C. Dep't of Educ.*, 23-cv-9332 (AT)(KHP)

Dear Judge Torres:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on administrative hearings under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 30-day extension of Defendant's time to respond to the Complaint, from February 19 to March 20, 2024. This is the second request for an extension, the first extension having been granted on November 14, 2023. (ECF 11) Defendant also respectfully requests that the joint status letter due Feb. 19 be adjourned to March 20, 2024 as well. Defendant has made an offer of settlement, which Plaintiff is considering. The requested extension should allow the parties the necessary time to engage in settlement discussions and hopefully resolve this matter without further burdening the Court. Plaintiff consents to these requests.

Accordingly, Defendant respectfully requests that Defendant's time to respond to the Complaint be extended to March 20, 2024, with a next joint status letter due that same date either informing the Court that matter has been fully resolved or proposing a briefing schedule.

Thank you for considering these requests.

GRANTED. By **March 20, 2024**, Defendant shall respond to the complaint and file the parties' joint status letter.

SO ORDERED.

Dated: February 20, 2024



ANALISA TORRES
United States District Judge